

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Case No. 22-cv-_____

Plaintiff,

v.

1. 15418 Hampshire Lane, Savage, Minnesota,
2. 5594 Candy Cove Trail SE, Prior Lake, Minnesota,
3. 5604 Candy Cove Trail SE, Prior Lake, Minnesota,
4. 3847 Cane Run Road, Louisville, Kentucky,
5. 6200 South 3rd Street, Louisville, Kentucky,
6. 2722 Park Avenue South, Minneapolis, Minnesota,
7. 2742 Park Avenue South, Minneapolis, Minnesota,
8. 5150 Alvarado Lane in Plymouth, Minnesota,
9. 2529 12th Avenue South, Minneapolis, Minnesota,
10. 301-309 (odd addresses) East Lake Street, Minneapolis, Minnesota,
11. 311-319 (odd addresses) East Lake Street, Minneapolis, Minnesota,
12. 3018 3rd Avenue South, Minneapolis, Minnesota,
13. 8432 Noble Ave N., Brooklyn Park, Minnesota,
14. 13825 Edgewood Avenue South, Savage, Minnesota,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

The plaintiff, United States of America, through its attorneys Charles J. Kovats, Jr., Acting United States Attorney for the District of Minnesota, and Craig Baune, Assistant United States Attorney, in a civil cause of action for forfeiture, alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is an action to forfeit and condemn the defendants *in rem* to the use and benefit of the United States of America pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C) for violations of 18 U.S.C. §§ 1341, 1343, 1349, 1956 and 1957.

THE DEFENDANTS *IN REM*

2. The defendants *in rem* are the following real properties:
 - a. The real property and premises located at 15418 Hampshire Lane in Savage, Minnesota 55378, legally described as:

Lot 7, Block 1, Creek Hill South, Scott County, Minnesota with property tax ID number 264680070,
 - b. The real property and premises located at 5594 Candy Cove Trail SE, Prior Lake, Minnesota 55378, legally described as:

Lot 1, Block 1, Bluffs of Candy Cove, Scott County, Minnesota with property tax ID number 254840010,
 - c. The real property and premises located at 5604 Candy Cove Trail SE, Prior Lake, Minnesota 55378, legally described as:

Lot 2, Block 1, Bluffs of Candy Cove, Scott County, Minnesota with property tax ID number 254840020,
 - d. The real property and premises located at 3847 Cane Run Road, Louisville, Kentucky 40211, legally described as:

Lot 129, Block 1004, Tract 0128011022 Shively, Jefferson County, Kentucky with assessor's property number 100401290000,
 - e. The real property and premises located at 6200 South 3rd Street, Louisville, Kentucky 40214, legally described as:

Louisville, Tract 0090004000 with assessor's property number 061L00230000,
 - f. The real property and premises located at 2722 Park Avenue South, Minneapolis, Minnesota 55404, legally described as:

Lot 23, Auditor's Subdivision Number 215 with property tax ID number 35-029-24-32-0017,
 - g. The real property located at 2742 Park Avenue South, Minneapolis, Minnesota 55404, legally described as:

Lot 1 thru 8, Block 1, Halls Addition to Minneapolis with property tax ID number 35-029-24-32-0157,

- h. The real property and premises located at 5150 Alvarado Lane in Plymouth, Minnesota 55446, legally described as:

Lot 13, Block 4, Creekside Hills 2nd Addition, Hennepin County, Minnesota, with property tax ID number 07-118-22-22-0068,

- i. The real property and premises located at 2529 12th Avenue South, Minneapolis, Minnesota 55404, legally described as:

Lot 12, Warnock and Laton's Subdivision of Block 13, Gale's First Addition to Minneapolis, Hennepin County, Minnesota with property tax ID number 35-029-24-13-0265,

- j. The real property with all structures located at 301-309 East Lake Street, Minneapolis, Minnesota 55408, legally described as:

Lots 42 to 47, State Addition to Minneapolis according to the recorded plat thereof together with all hereditaments and appurtenances with property tax ID number 03-028-24-11-0093,

- k. The real property with all structures located at 311-319 East Lake Street, Minneapolis, Minnesota 55408, legally described as:

Lots 38, 39, 40 and 41, State Addition to Minneapolis according to the recorded plat thereof together with all hereditaments and appurtenances with property tax ID number 03-028-24-11-0092,

- l. The real property located at 3018 3rd Avenue South, Minneapolis, Minnesota 55406, legally described as:

Lot 5, Block 1, Baker's 2nd Addition to Minneapolis with property tax ID number 03-028-24-12-0005,

- m. The real property and premises located at 8432 Noble Ave N, Brooklyn Park, Minnesota 55443, legally described as:

The North 313 feet of the West 480 feet of the Northwest 1/4 of the Northwest 1/4 of Section 22, Township 119, Range 21, Hennepin County, Minnesota, except the East 250 Feet Thereof with property tax ID number 22-119-21-22-0006,

- n. The real property and premises located at 5026 93rd Ave N, Brooklyn Park, Minnesota, legally described as:

Lot 33, Block 1, Amesbury Place 2nd Addition, Brooklyn Park, with property tax ID number 09-119-21-44-0065,

- o. The real property and premises located at 13825 Edgewood Avenue South, Savage, Minnesota 55378, legally described as:

26264 Connelly Park Townhomes CIC 1044, Lot 30, Block 2 with property tax ID number 262640620.

(Collectively, “the Defendant Real Property.”)

3. The Defendant Real Property has not been seized but is within the jurisdiction of this Court. The United States does not request authority from the Court to seize the Defendant Real Property at this time. The United States will, as provided by 18 U.S.C. §§ 985(b)(1) and (c)(1):

- a. Post notice of this action and a copy of the Complaint on the Defendant Real Properties;
- b. Serve notice of this action on the owners of the Defendant Real Properties and any other person or entity who may claim an interest in the Defendant Real Properties, along with a copy of this Complaint; and
- c. File a notice of *lis pendens* in the county property records.

JURISDICTION AND VENUE

4. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Real Property. This Court has jurisdiction over an action commenced by the

United States under 28 U.S.C. § 1345 and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has *in rem* jurisdiction over the Defendant Real Property under 28 U.S.C. § 1355(b). As is set forth above, this property was purchased using fraud proceeds, and it was involved in and is traceable to funds involved in money laundering transactions.

6. Venue is proper in the District of Minnesota pursuant to 28 U.S.C. § 1355(b)(1) because acts or omissions giving rise to the forfeiture occurred in this District, and pursuant to 28 U.S.C. § 1395 because some of the Defendant Real Properties are located in this District.

FACTS

I. OVERVIEW

7. In recent years, individuals and companies in Minnesota (“the conspirators”) have engaged in a large-scale scheme to fraudulently obtain and misappropriate federally-funded child nutrition programs. The scheme was carried out by individuals who owned and operated companies purportedly in the business of providing federally funded free meals to underprivileged children and adults, including during the global Covid-19 pandemic.

8. The conspirators received tens of millions of dollars in federal funds for use in providing nutritious meals to underprivileged children and adults. Almost none of this money was used to feed children. Instead, conspirators misappropriated the money and

used it to purchase real estate, cars, and other luxury items. To date, the conspirators have stolen millions of dollars in federal funds. The scheme is ongoing.

9. Through this case, the United States seeks the forfeiture of real property that was purchased with the proceeds of that conspiracy to commit mail and wire fraud, and which was involved in, or is traceable to property involved in, the conspiracy to commit money laundering with respect to the proceeds of that fraud.

II. BACKGROUND OF THE SCHEME

10. This complaint relates to an ongoing investigation into a scheme to defraud U.S. Department of Agriculture (“USDA”) programs that provide federal funding to nutrition programs for children and low-income individuals across the nation. The USDA operates two such programs—the Summer Food Service Program and the Child and Adult Care Food Program.

11. The Summer Food Service Program (“SFSP”) is a federal program designed to ensure that low-income children continue to receive nutritious meals when school is not in session.

12. The Child and Adult Care Food Program (“CACFP”) is a federal program that provides reimbursements for nutritious meals and snacks to eligible children and adults who are enrolled for care at participating childcare centers, day care homes, and adult day care centers. CACFP also provides reimbursements for meals served to children and youth participating in afterschool care programs, children residing in emergency shelters, and adults over the age of 60 or living with a disability and enrolled in day care facilities.

13. The SFSP and CACFP (together, the “Federal Child Nutrition Programs”) operate throughout the United States. The USDA’s Food and Nutrition Service administers the programs at the national and regional levels by disbursing federal funds to state governments, which provide oversight over the Federal Child Nutrition Programs.

14. Within each state, the Federal Child Nutrition Programs are administered by the state department of education or an alternate state-designated agency. In Minnesota, the programs are administered by the Minnesota Department of Education (“MDE”).

15. Locally, meals funded by the Federal Child Nutrition Program are served at sites such as schools or daycare centers. Each site must be sponsored by a public or private non-profit organization that is authorized to participate in the Federal Child Nutrition Programs (“Sponsors”). Sponsors seeking to participate in the Federal Child Nutrition Programs are required to submit an application to the MDE for approval for each site from which they intend to operate Federal Child Nutrition Programs. Sponsors are responsible for monitoring each of their sites and preparing reimbursement claims for their sites.

16. Federal Child Nutrition Program funds are required to be used to provide nutritious meals and food to children and low-income individuals. *See* 7 C.F.R. § 225.15(a)(4) (“All Program reimbursement funds must be used solely for the conduct of the nonprofit food service operation.”).

17. Historically, the Federal Child Nutrition Programs have generally functioned through the provision of meals to children involved in educational-based programs or activities. During the Covid-19 pandemic, however, the USDA waived some of the standard requirements for participation in the Federal Child Nutrition Program. Among

other things, USDA allowed for-profit restaurants to participate in the program. It also allowed for off-site food distribution to children outside of educational program. At the same time, MDE's stay-at-home order and telework policies interfered with the ability to oversee the program. According to MDE officials, this left the program vulnerable to fraud and abuse.

III. FEEDING OUR FUTURE

18. This complaint further relates to the investigation of the widespread diversion and misuse of Federal Child Nutrition Program funds during the Covid-19 pandemic. In or about April 2021, MDE provided information to the FBI alleging that Feeding Our Future and sites under its sponsorship were diverting funds away from the nutrition program. MDE believed certain sites were submitting fraudulent documents to support reimbursement of funds in addition to artificially inflating the number of children and low-income individuals receiving benefits in order to obtain funds.

19. Feeding Our Future is a non-profit organization purportedly in the business of helping community partners participate in the Federal Child Nutrition Program and related federal programs.

20. Feeding Our Future sponsors and helps administer sites that participate in the Federal Child Nutrition Program. According to its website, Feeding Our Future "utilize[s] the Child and Adult Care Food Program to increase healthy food access for Minnesota's youth and seniors." The website lists Aimee Bock as the founder and executive director of Feeding Our Future.

21. Records obtained from MDE show that, after being formed in 2017, Feeding Our Future quickly began receiving and distributing millions of dollars in Federal Child Nutrition Program Funds. The company went from receiving \$3.4 million in 2019 to more than \$197 million in 2021.

Year	Approximate amount of Federal Child Nutrition Program funds to Feeding Our Future
2018	\$307,253
2019	\$3,487,168
2020	\$42,681,790
2021	\$197,932,695
Total	\$244,408,906

22. MDE became concerned about the massive increase in Federal Child Nutrition Program funds going to sites sponsored by Feeding Our Future as well as the large increase in the number of sites under Feeding Our Future sponsorship. According to MDE employees, MDE began more carefully scrutinizing new site applications submitted by Feeding Our Future.

23. Feeding Our Future later sued MDE, alleging that it unlawfully denied its site applications and withheld reimbursements to which Feeding Our Future and sites under its sponsorship were entitled. This lawsuit is pending in Ramsey County District Court.

24. In May 2021, the FBI began investigating allegations surrounding the misuse of federal funds intended for feeding children and low-income individuals. As part of this investigation, the FBI obtained records of hundreds of bank accounts that received, either directly or indirectly, Federal Child Nutrition Program funds. A review of these financial records showed a massive fraud scheme involving the misuse and theft of tens of millions of dollars in Federal Child Nutrition Program funds.

25. As set forth below, the conspirators used various entities to generate fraudulent invoices to Feeding Our Future, which were typically sent through electronic means, through which they could receive payments for services and food that was not provided, and through which they could launder the proceeds of that fraud. This civil forfeiture complaint is commenced against real property that was purchased with the proceeds of that fraud scheme and with funds traceable to money laundering.

IV. THE RELEVANT PARTICIPATING ENTITIES

26. The conspiracy described herein is extensive and includes many people and entities. Because this is an *in rem* complaint filed only against certain specific properties, only those conspirators who are most pertinent to the Defendant Real Properties are addressed herein.

A. Safari Restaurant and Related Entities

1. Safari Restaurant is Created and Almost Immediately Claims Entitlement to Hundreds of Thousands of Dollars in Federal Child Nutrition Program Funds

27. Safari Restaurant and Event Center is one of the sites receiving Federal Child Nutrition Program money under the sponsorship of Feeding Our Future. A group of individuals who own or are associated with Safari Restaurant have participated in a fraudulent scheme to obtain and misappropriate millions of dollars in Federal Child Nutrition Program funds.

28. Beginning in 2020, these individuals created several companies for use in carrying out these schemes. They enrolled their companies in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future. They then claimed to be feeding

meals to thousands of children a day, for which they were reimbursed more than \$10 million.

29. But bank records show they misappropriated most of this money and used it to purchases real estate, cars, and other luxury items.

30. Safari Restaurant is a restaurant and event center located at 3010 Fourth Avenue South in Minneapolis. Safari Restaurant is owned by a limited liability company called Cosmopolitan Business Solutions LLC.

31. Safari Restaurant applied to participate in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future in April 2020. Salim Said signed the application on behalf of Safari Restaurant and Aimee Bock signed on behalf of Feeding Our Future. The application stated that Safari Restaurant would be serving meals at 3010 Fourth Avenue South, Minneapolis, Minnesota.

32. On or about April 24, 2020, MDE informed Bock that it was denying the application. In an email to Bock, an MDE employee explained that “[b]ased on guidance from USDA, we aren’t creating any new CACFP At-Risk site IDs for locations not currently providing care.”

33. Bock and Feeding Our Future objected to the denial of the application. On or about April 24, 2020, Bock claimed that “[t]hese sites are already providing meals to the states youth with the expectation of the meals being reimbursed” and asked what “authority . . . allows you to deny site applications to sites that are clearly eligible.”

34. Bock and Feeding Our Future subsequently submitted a formal complaint to MDE about the denial of Safari Restaurant’s application.

35. In an email sent on April 28, 2020, an attorney representing Feeding Our Future told MDE he was going to be filing a formal complaint about the denial of the application.

36. Later that day, Bock sent a follow-up email to an MDE employee. Bock said she “was extremely disappointed that MDE would deny these sites the opportunity to feed youth culturally relevant foods during this national emergency. It was even more shocking considering the great work these sites do.”

37. Two days later, on or about April 30, 2020, MDE approved Safari Restaurant’s application and authorized its participation in the Federal Child Nutrition Program.

38. By July 2020, Safari Restaurant claimed to be serving meals to 5,000 children a day. That month, MDE conducted an administrative review and audit of Safari Restaurant’s participation in the SFSP. As part of that review, MDE requested meal count records showing the number of meals served at the site each day.

39. In response to MDE’s request, Feeding Our Future submitted weekly count forms falsely reporting that Safari Restaurant provided both breakfast and lunch for 5,000 children a day, seven days a week, in July 2020. Safari Restaurant claimed that it served both breakfast and lunch to between 4,985 and 4,998 children each day of July 2020.

40. Bank records show that Safari Restaurant received approximately \$476,000 in Federal Child Nutrition Program funds in July 2020. The company received approximately \$702,000 in Federal Child Nutrition Program funds in August 2020.

2. Individuals Involved in Safari Restaurant Applied to Open Additional Sites in Fall 2020

41. In the fall of 2020, individuals associated with Safari Restaurant enrolled additional sites in the Federal Child Nutrition Program. These sites were run by new companies created for use in participating in the Federal Child Nutrition Program, including ASA Limited LLC, Olive Management Inc., Tunyar Trading and Horseed Management. These sites quickly began reporting that they were serving large numbers of children.

42. According to Minnesota Secretary of State records, Abdihakim Ali Ahmed created ASA Limited LLC on or about September 4, 2020. Secretary of State records list 3010 Fourth Avenue South as the mailing address for ASA Limited LLC.

43. That same day, ASA Limited LLC completed an application to enroll in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future. The application and accompanying “New Site Intake” form stated that ASA Limited LLC would be serving both breakfast and lunch to 3,000 children on Saturday and Sundays.

44. Abdihakim Ahmed signed the application on behalf of ASA Limited LLC. Aimee Bock signed the application on behalf of Feeding Our Future. In correspondence with MDE, Bock explained that ASA Limited would be “serving youth living in St. Paul” and “in an area that does not have other culturally appropriate food sites.”

45. ASA Limited immediately began falsely claiming that it was entitled to large amounts of Federal Child Nutrition Program funds. For example, ASA Limited claimed

that it was entitled to more than \$700,000 in Federal Child Nutrition Program funds for meals served in September and October 2020.

46. In all, MDE records show that ASA Limited has received more than \$5.3 million in Federal Child Nutrition Program funds since its creation in September 2020.

47. Minnesota Secretary of State records show that Olive Management was created by Ahmed Omar-Hashim in September 2020. That same month, the company submitted an application to participate in the Federal Child Nutrition Program.

48. The application stated that Olive Management would be serving both breakfast and lunch and 2,500 meals a day. The site address was listed as 3010 Fourth Avenue South, the same address as Safari restaurant. Ahmed Omar-Hashim signed the application on behalf of Olive Management and Aimee Bock signed on behalf of Feeding Our Future.

49. The application included an agreement between Feeding Our Future and Olive Management authorizing Feeding Our Future to charge administration fees “not to exceed 10 percent” of the Federal Child Nutrition Program reimbursements received by Olive Management.

50. Olive Management immediately began falsely claiming that it was entitled to large amounts of Federal Child Nutrition Program funds. For example, the company claimed that it was entitled to more than \$1.2 million in Federal Child Nutrition Program funds for meals served from September to November 2020.

51. In all, MDE records show that Olive Management has received more than \$5.2 million in Federal Child Nutrition Program funds since its creation in September 2020.

52. Both Tunyar Trading LLC and Horseed Management LLC were set up in September-October 2020. According to Minnesota Secretary of State records, Tunyar Trading LLC was formed on or about September 28, 2020, and Horseed Management LLC was formed on October 9, 2020. As is set forth below, both of these entities were used to receive and launder Federal Child Nutrition Program funds together with Safari and others.

3. Safari Restaurant and Other Related Entities Obtain More Than \$15 Million in Federal Child Nutrition Program Funds Through Fraudulent Submissions

53. Bank records show that more than \$15 million in Federal Child Nutrition Program funds were deposited into bank accounts held by Cosmopolitan Business Solutions dba Safari Restaurant between May 2020 and November 2021.

54. A review of these accounts shows that little of this money was used to buy food or other items related to participation in the Federal Child Nutrition Program. Instead, the most significant withdrawals from the Safari Restaurant accounts were to limited liability companies controlled by owners or associates of Safari Restaurant, including 3017 LLC, Salim Limited LLC, Afra Grill LLC, AG Limited LLC, 1130 Holdings LLC, Tunyar Trading LLC and Horseed Management LLC. This money was then used to purchase real estate, cars, and other luxury items.

55. Both Tunyar Trading and Horseed Management had vendor contracts to provide food or meals to sites sponsored by Feeding Our Future. According to these contracts, Feeding Our Future would pay the companies \$2.13 per breakfast and \$3.67 per lunch.

56. Both companies opened bank accounts into which millions of dollars in fraudulently-obtained Federal Child Nutrition Program funds flowed. But bank records show that these companies did not use these funds to buy food or prepare meals. Instead, the companies functioned primarily as shell companies to help launder misappropriated and fraudulently obtained Federal Child Nutrition Program funds.

57. Stigma-Free International Inc. is another company that receives large sums of fraudulently-obtained Federal Child Nutrition Program funds. Records obtained from U.S. Bank and Bank of America show that Stigma-Free International Inc. received more than \$6.5 million from Feeding Our Future since January 2021. Bank records show this money was not used to purchase food or meals for underprivileged children. Instead, the bulk of the money was transferred to entities controlled by individuals associated with Safari Restaurant.

58. Although bank records show that Stigma-Free did not use the Federal Child Nutrition Program funds to purchase food or prepare meals, the company claimed to be serving meals to thousands of children a day. For example, in September 2021, the owner of Stigma Free, Abdikadir Mohamud, sent an email to Aimee Bock with the subject line “Willmar Meal Count/Invoice for September.” Attached to the email were “Summer Meal Counts” claiming that Stigma Free served 2,000 meals a day, seven days a week during August 2021 in Willmar, Minnesota.

59. According to the latest census data, only 21,000 people live in Willmar.

60. Bank records show that little of the money deposited into the Tunyar Trading LLC or Horseed Management LLC accounts was used to purchase food or meals to serve

to underprivileged children. Instead, the bulk of the money was transferred to other limited liability companies and entities, including entities controlled by owners of associates of Safari Restaurant.

61. Stone Bridge Development LLC was created by Abdi Nur Salah in January 2021, per Minnesota Secretary of State records. A review of the Stone Bridge Development LLC account at Star Choice Credit Union shows that Abdi Nur Salah used the account for personal spending, as well as for the purchase of real property, rather than for legitimate business purposes related to the distribution of food to children.

62. Bank records show that more than \$900,000 in checks from Tunyar Trading were deposited into a bank account of Stone Bridge Development LLC between February 19, 2021, and December 13, 2021. A review of bank records shows that the money received by Stone Bridge Development LLC from Tunyar Trading were the proceeds of fraudulently obtained Federal Child Nutrition Program funds—specifically, funds received by Stigma Free International between February and May 2021.

B. S & S Catering Inc. And Related Entities

1. S&S Catering Inc.

63. S & S Catering Inc. is one of the companies fraudulently receiving and misappropriating Federal Child Nutrition Program funds.

64. According to the Minnesota Secretary of State, S & S Catering Inc. was organized in or about November 2018 by Qamar Ahmed Hassan. The company's registered office and principal executive office is listed as 307 East Lake Street, Minneapolis, Minnesota 55407 ("307 East Lake").

65. S & S Catering participated in the Federal Child Nutrition Program under the sponsorship of both Feeding Our Future and Partners in Nutrition.¹ S & S Catering is a for-profit company that participated in the Federal Child Nutrition Program both as a vendor that provided food to sites that claimed to be serving meals to underprivileged children and as a site that itself served meals to children.

66. S & S Catering received its reimbursements from the Federal Child Nutrition Program into an array of banks accounts at several different financial institutions.

67. A review of these accounts shows that in 2020 and 2021 S & S Catering received more than \$3.2 million in Federal Child Nutrition Program funds directly from Feeding Our Future and another \$1.3 million from Partners in Nutrition.

68. Bank records show that S & S Catering also received millions of dollars from other companies that participated in and received money from the Federal Child Nutrition Programs, including Youth Inventor's Lab, Academy for Youth Excellence, Youth High Educational Achievement, and Advance Youth Athletic Development. In all, S & S Catering received more than \$13.8 million in Federal Child Nutrition Programs funds in 2020 and 2021.

Source of Funds	Entity Owner	Amount Deposited (approximate)
Academy for Youth Excellence	Sahra Mohamed Nur	\$3,486,000
Feeding Our Future	--	\$3,244,314
Youth Inventor's Lab	Bekam Merdassa	\$2,358,926

¹ Partners in Nutrition, also referred to as Partners in Quality Care, is another company responsible for sponsorship and administration regarding sites that participate in the Federal Child Nutrition Program.

Advance Youth Athletic Development	Guhaad Said	\$2,013,000
Youth Higher Educational Achievement	Filsan Mumin Hassan	\$1,448,000
Partners in Nutrition	--	\$1,316,310
	Total	\$13,866,550

69. A review of records from the S & S Catering bank accounts show that it only used approximately \$465,000—or 3.3 percent—of the Federal Child Nutrition Program funds it received to buy food or meals to serve to underprivileged children. Instead, bank records show that the vast majority of the money was transferred to the owners of S & S Catering or used for the benefit of individuals involved in the scheme.

Use of Funds	Related Person or Entity	Amount (approximate)
Transfers to Golis Properties	Qamar Ahmed Hassan Mohamed A. Mohamud Sahra Mohamed Nur	\$3,865,932
Transfers to Transportation Companies	--	\$2.2 million
Payments to Individuals employed by or related to S & S Catering	--	\$1,397,000
Transfers to Title Companies for Purchase of Real Estate	Bankers Title Executive Title North Star Realty North Title	\$1,190,000
Payments to Qamar Ahmed Hassan	Qamar Ahmed Hassan, owner of S & S Catering	\$757,624
Cash Withdrawals		\$281,382
Payments to Benadir Hall	Abdullahe Jesow	\$224,300
Wire Transfer to China	Kafi General Trading	\$160,000
Payments to Sahra Mohamed Nur	Sahra Mohamed Nur, owner of Academy for Youth Excellence	\$92,200
HOM Furniture	--	\$52,412
	Total²	\$10,168,438

² S & S Catering had approximately \$2.3 million remaining in its accounts as of late 2021.

70. This activity was designed to perpetuate the fraud scheme described above and launder the money fraudulently obtained from the Federal Child Nutrition Program.

2. S & S Catering and Related Entities Misappropriate Millions of Dollars of Federal Child Nutrition Program Funds

i. Academy for Youth Excellence

71. Academy for Youth Excellence is a company that is fraudulently misappropriating Federal Child Nutrition Program funds.

72. Academy for Youth Excellence is located at 309 East Lake, Minneapolis, Minnesota 55408 (“309 East Lake”). According to Minnesota Secretary of State records, Sahra Mohamed Nur incorporated Academy for Youth Excellence on or about November 18, 2020.

73. Academy for Youth Excellence applied to participate in the Federal Child Nutrition Program starting in December 2020. According to its application submitted via Feeding Our Future, meals provided by Academy for Youth Excellence were to be prepared on site at 309 East Lake. Based on surveillance, 309 East Lake is Benadir Hall, a large banquet hall. According to Minnesota Secretary of State records, Benadir Hall Inc.’s principal place of business and mailing address are the same as Academy for Youth Excellence’s.

74. By December 27, 2020, Sahra Mohamed Nur claimed that Academy for Youth Excellence was serving breakfast and lunch to 2,500 children a day, five days a week. By the week of January 4, 2021, Sahra Mohamed Nur was claiming that Academy

for Youth Excellence was serving breakfast and lunch to 2,500 children a day, seven days a week.

75. Based on these false claims, Academy for Youth Excellence received approximately \$739,000 in Federal Child Nutrition Program funds for January and February 2021.

76. Bank records show that Academy for Youth Excellence received more than \$4.1 million in Federal Child Nutrition Program funds in 2021, and that the vast majority of these funds were transferred to other people and entities involved in this scheme, including to \$3,536,000 to S & S Catering, \$89,340 to Sahra Mohamed Nur, \$115,000 to Benadir Hall, and \$100,000 to other Academy for Youth Excellence accounts.

77. Although S & S Catering was supposed to be a vendor providing meals to Academy for Youth Excellence and others, a review of S & S Catering's bank accounts show that little of the money it received from Youth Academy for Youth Excellence was used to purchase food or prepare meals for underprivileged children.

ii. Advance Youth Athletic Development

78. Advance Youth Athletic Development, also known as "Central Avenue Lofts," also received Federal Child Nutrition Program funds through this fraud scheme.

79. Advance Youth Athletic Development was incorporated in February 2021. Minnesota Secretary of State records list 920 24th Avenue NE, Unit 220, Minneapolis, Minnesota 55418 as the address for Advance Youth Athletic Development. This is a unit in the Central Avenue Lofts apartment building.

80. Advance Youth Athletic Development applied to participate in the Federal Child Nutrition Program under the sponsorship of Feeding Our Future. The application indicated that the meals would be served at the Central Avenue Lofts apartment building.

81. Advance Youth Athletic Development submitted claims to MDE that it was serving an afterschool snack and supper to 5,000 children a day in March 2021. The company claimed that it was entitled to approximately \$730,000 in reimbursements from the Federal Child Nutrition Program for that month alone.

82. This is an exceedingly large number of children. By way of comparison, the largest high school in the state of Minnesota—Wayzata High School—has an enrollment of approximately 3,600 students.

83. MDE initially denied the site application in April 2021. In May 2021, Feeding Our Future appealed MDE's decision, and eventually Advance Youth Athletic Development was enrolled in the program and provided reimbursements from the Federal Child Nutrition Program.

84. In all, MDE records show that Advance Youth Athletic Development received approximately \$3.2 million in Federal Child Nutrition Program funds in 2021.

C. Empire Cuisine, ThinkTechAct and Related Entities

1. ThinkTechAct Foundation a/k/a Mind Foundry Learning Foundation

85. ThinkTechAct Foundation is one of the companies fraudulently receiving and misappropriating Federal Child Nutrition Program funds.

86. According to the Minnesota Secretary of State, ThinkTechAct Foundation was organized in or about April 2016 by Mahad Ibrahim. According to Minnesota Secretary of State records, Mind Foundry Learning Foundation is an assumed name under which ThinkTechAct Foundation does business.

87. According to its website, thinktechact.org, ThinkTechAct Foundation's mission is "to provide quality STEM educational programming and promote health and wellness initiatives to youth in unserved low income communities."

88. ThinkTechAct Foundation participated in the Federal Child Nutrition Program via the sponsorship of both Feeding Our Future and, as Mind Foundry, under the sponsorship of Partners in Nutrition. According to records obtained from MDE, ThinkTechAct claimed to be serving meals to thousands of children a day. For example, MDE records show that ThinkTechAct claimed to be providing meals to approximately 160,666 children a day at 10 locations in June 2021.

89. ThinkTechAct receives Federal Child Nutrition Program funds from both sponsors into an account at U.S. Bank. Mahad Ibrahim is the signatory on this account.

90. A review of ThinkTechAct Foundation's U.S. Bank account shows that the company received more than \$16 million in Federal Child Nutrition Program funds from February 2021 to November 2021. The company received approximately \$14,292,507 from Partners in Nutrition and approximately \$2,394,100 from Feeding Our Future. Almost 99 percent of the funds deposited into ThinkTechAct Foundation's U.S. Bank account were Federal Child Nutrition Program funds.

91. These Federal Child Nutrition Program funds were intended to reimburse the company for the cost of meals provided to underprivileged children. Bank records show that the company used little, if any, money to purchase food or provide meals to children.

92. Instead, bank records show that the funds were transferred to other accounts that appear to function essentially as shell companies designed to help launder fraudulently obtained and misappropriated Federal Child Nutrition Program funds. In all, approximately \$11.6 million was transferred to companies owned or controlled by the owners of Empire or other co-conspirators.

Entity	Entity owner/account holder	Amount Transferred (approximate)
Empire Cuisine and Market	Abdiaziz Farah and Abdimajid Mohamed Nur	\$6.9 Million
Empire Enterprises	Abdiaziz Farah and Abdimajid Mohamed Nur	\$3.2 Million
Empire Gas & Grocery LLC	Abdiaziz Farah Mohamed Ismail	\$100,000
Bushra Wholesalers LLC	Said Farah Abdiwahab Aftin	\$1.4 Million
		\$11.6 Million

93. Bushra Wholesalers LLC was used to help launder fraudulently obtained and misappropriated Federal Child Nutrition Program funds. According to Minnesota Secretary of State records, Bushra Wholesalers LLC was formed on or about February 10, 2021, by Said Farah. Since then, the company opened bank accounts at Bank of America and TruStone Financial Credit Union into which flowed thousands of dollars in fraudulently obtained Federal Child Nutrition Program funds.

94. ThinkTechAct Foundation also transferred approximately \$10.2 million in Federal Child Nutrition Program funds to Empire Cuisine & Market LLC, Empire Enterprises LLC, and Empire Gas & Grocery LLC. All of these companies were created and controlled by Abdiaziz S. Farah and Abdimajid Mohamed Nur. The money from the Federal Child Nutrition Program that was deposited into these accounts was not used to purchase food or serve meals to underprivileged children.

2. Empire Cuisine & Market LLC

95. According to the Minnesota Secretary of State, Empire Cuisine & Market LLC was organized by Abdiaziz S. Farah on or about April 1, 2020.

96. Empire Cuisine & Market LLC has a contract to be a vendor for the SFSP. The contract stated that Empire Cuisine & Market LLC would be providing meals to sites participating in the Federal Child Nutrition Program. The application lists 15 addresses/sites for distribution of food including locations in Minneapolis, St. Paul, Faribault, Owatonna, Shakopee, Bloomington, Circle Pines, and Savage.

97. The contract between Partners in Nutrition and Empire Cuisine & Market LLC specified that Partners in Nutrition would pay Empire Cuisine & Market LLC \$2.01 per breakfast and \$3.52 per lunch for the SFSP. The money paid by Partners in Nutrition were Federal Child Nutrition Program funds.

98. In or about June 2021, Aimee Bock emailed MDE and requested to change Empire Cuisine & Marketing LLC's sponsorship from Partners in Nutrition to Feeding Our Future.

99. Empire Cuisine & Market LLC has received Federal Child Nutrition Program funds from both Partners in Nutrition and Feeding Our Future. A review of these accounts shows that from on or about May 15, 2020, to on or about November 30, 2021. Empire Cuisine & Market LLC received approximately \$11,065,498 in Federal Child Nutrition Program funds via Partners in Nutrition and approximately \$794,157 in Federal Child Nutrition Program funds via Feeding Our Future. Bank records show that during this same time period, approximately \$6,943,959 was transferred to Empire Cuisine & Market LLC from ThinkTechAct Foundation, which was the proceeds of fraudulently obtained Federal Child Nutrition Program funds.

100. A review of these accounts shows that little of this money was used to buy food or other items related to participation in the Federal Child Nutrition Program. Instead, the most significant withdrawals from the Empire Cuisine & Market bank accounts were to limited liability companies controlled by Empire Cuisine & Market owners. This money was then used to purchase properties, pay builders, to purchase high end clothing, travel, make international money transfers and other luxury items, including the Defendant Real Property.

3. Empire Enterprises LLC

101. ThinkTechAct Foundation also transferred approximately \$3,189,119 to an account held by Empire Enterprises LLC, another company created and controlled by Abdiaziz Farah and Abdimajid Mohamed Nur.

102. According to the Minnesota Secretary of State, Empire Enterprises LLC was organized on April 5, 2021.

103. Empire Enterprises LLC received more than \$861,000 in Federal Child Nutrition Program funds between in or about April 2021 and in or about September 2021.

104. In addition, it also received more than \$4 million in Federal Child Nutrition Program funds from accounts held by Empire Cuisine & Market LLC and ThinkTechAct Foundation. In all, from April 2021 to June 2021, more than \$4.2 million in Federal Child Nutrition Program funds were deposited into the Empire Enterprises LLC's account at Old National Bank. This represented 99 percent of the funds deposited into the account.

105. These funds were not used to buy food or provide meals to underprivileged children. Bank records show that almost none of this money was used to purchase food. Instead, a large portion of this money was used to purchase real estate in Kenya and the United States, including the Defendant Real Properties.

V. THE DEFENDANT PROPERTIES

A. 15418 Hampshire Lane in Savage, Minnesota

107. Abdiaziz Farah used Federal Child Nutrition Programs funds from the Empire Enterprises LLC account to purchase a single-family home located at 15418 Hampshire Lane in Savage, Minnesota.

108. Bank records show that on or about April 15, 2021, \$575,000 was transferred from the Empire Enterprises LLC account at Old National Bank to Trademark Title Services. The wire transfer documents indicated that the funds were for the purchase of 15418 Hampshire Lane, Savage, Minnesota.

109. All of the funds for Farah's purchase of 15418 Hampshire Lane were derived from Federal Child Nutrition Program funds and are traceable to the fraud and money laundering scheme described above.

B. 5594 and 5604 Candy Cove Trail SE, Prior Lake, Minnesota

110. More than \$1 million in Federal Child Nutrition Program funds were used to purchase two lakefront lots on Prior Lake for more than \$1 million.

111. On or about July 7, 2021, Abdimajid Mohamed Nur obtained a cashier's check for approximately \$1,041,992 from an Empire Enterprises LLC account at Old National Bank. The check was made payable to Trademark Title Services. The addresses 5594 and 5604 Candy Cove Trail SE, Prior Lake, Minnesota were handwritten on the check.

112. Bank records show that all of the money used to obtain this cashier's check was derived from fraudulently-obtained Federal Child Nutrition Program funds received by ThinkTechAct Foundation or Empire Enterprises LLC. Minnesota Department of Revenue records similarly show that Empire Enterprises LLC purchased these lots on or about July 26, 2021, for \$1.1 million in cash.

113. Title to these properties was transferred to Empire Enterprises LLC. They are the proceeds of the fraud scheme and were involved in money laundering transactions and are traceable to such property.

C. 3847 Cane Run Road, Louisville, Kentucky

114. BBI, LLC purchased the real property at 3847 Cane Run Road, Louisville, Kentucky for \$208,091 in May 2021.

115. Kentucky Secretary of State records show that BBI, LLC was organized on March 22, 2021.

116. Bank records show that this property was purchased with funds from Stock Yards Bank and Trust account No. *****34, which is held in the name of BBI, LLC.

117. That account at Stock Yards Bank was funded entirely or virtually entirely with the direct or indirect proceeds of the fraud and money laundering conspiracy, including \$466,404.00 of deposits from Empire Cuisine and Market LLC and \$56,332 from Bushra Wholesalers LLC.

118. As a result, this property was purchased using fraud proceeds, and it was involved in and is traceable to funds involved in money laundering transactions.

D. 6200 South 3rd Street, Louisville. Kentucky.

119. BBI LLC funded the purchase of this property in October 2021 using funds traceable to the fraud and money laundering conspiracies.

120. According to bank records and other documents, BBI LLC paid \$10,000 earnest money, and \$50,000 at closing to purchase this property, which was then titled to Masjid Bilal Islamic Center Inc.

121. BBI LLC funded this purchase with funds from Stock Yards Bank and Trust account No. *****42.

122. That account at Stock Yards Bank was funded entirely or virtually entirely with the direct or indirect proceeds of the fraud and money laundering conspiracy, including \$466,404 of deposits from Empire Cuisine and Market LLC and \$56,332 from Bushra Wholesalers LLC.

123. As a result, this property was purchased using fraud proceeds, and it was involved in and is traceable to funds involved in money laundering transactions.

E. 2722 Park Avenue South, Minneapolis, Minnesota, and 2742 Park Avenue South, Minneapolis, Minnesota,

124. A review of bank records shows that Salim A. Said, Abdulkadir Nur Salah, and Ahmed Omar-Hashim used \$2.8 million in federal child nutrition program funds to purchase a commercial office building located at 2722 Park Avenue South, Minneapolis, Minnesota, and an adjacent parking lot at 2742 Park Avenue South (together, the “Park Avenue Properties”).

125. The money used to purchase the Park Avenue Properties was the proceeds of the fraud scheme to obtain Federal Child Nutrition Program funds. These funds came from Feeding Our Future and were deposited into bank accounts held by several companies owned and controlled by owners or associates of Safari Restaurant:

Entity (Bank Account)	Entity Owner/Account Holder	Amount Received into Account from Feeding Our Future (Approximate)	Date Range
Cosmopolitan Business Solutions d/b/a Safari Restaurant	Abdulkadir Nur Salah Salim A. Said	\$5,533,739	2/19/2021 to 5/14/2021
ASA Limited LLC	Abdihakim A. Ahmed Salim A. Said	\$2,211,460	2/16/2021 to 5/20/2021
Stigma Free International Inc.	Ahmed M. Artan	\$779,666	1/15/2021 to 1/25/2021
Olive Management Inc.	Ahmed S. Hashim	\$1,124,435	5/20/2021

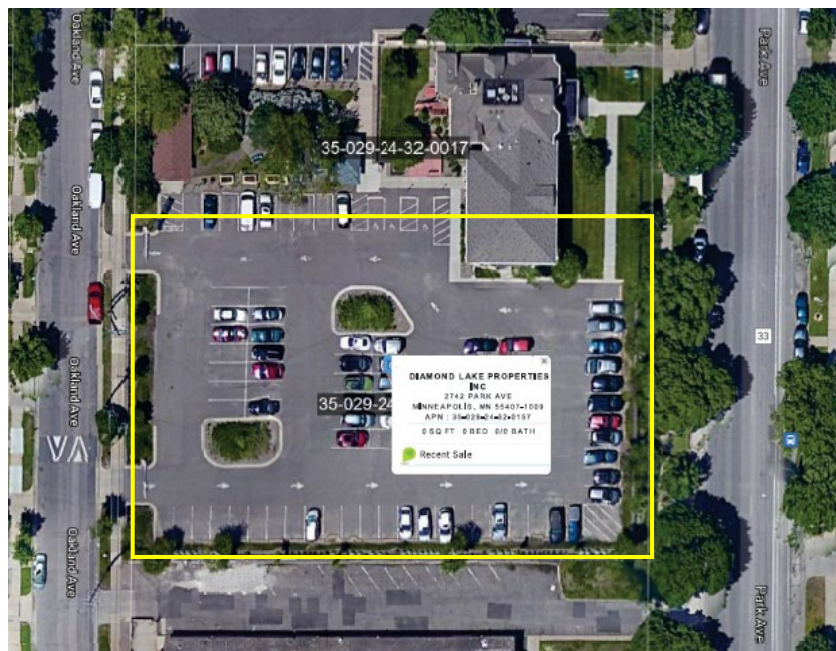
126. As explained above, these entities were shell companies whose bank accounts were used to launder fraud proceeds.

127. After being laundered through various other bank accounts, a total of \$2,750,000 was deposited into an account in the name of Cosmopolitan Business Properties LLC at Bridgewater Bank on July 2, 2021. The money was transferred from bank accounts held by four entities owned or controlled by owners or associates of Safari Restaurant.

128. The Cosmopolitan Business Properties bank account was created and first used for this transaction. On or about July 15, 2021, less than two weeks after these funds had been transferred into the account, Cosmopolitan Business Properties LLC used the money to purchase the Park Avenue Property for \$2,780,000. 2722 Park Avenue is one of the large historic mansions on Park Avenue in south Minneapolis. The property has been converted into office space.



129. According to title company records, 2742 Park Avenue is a large parking lot located just south of 2722 Park Avenue.



130. As is set forth above, this property was purchased using fraud proceeds and it was involved in, and is traceable to funds involved in, money laundering transactions.

F. 5150 Alvarado Lane in Plymouth, Minnesota

131. Salim Said, one the Safari Restaurant owners, purchased a single-family home located at 5150 Alvarado Lane in Plymouth, Minnesota using more than \$950,000 of proceeds of the fraud scheme described above.

132. Bank records show that Feeding Our Future paid these funds to three companies owned or controlled by Said or other associates of the Safari Restaurant group: Stigma Free International, ASA Limited LLC, and Cosmopolitan Business Solutions d/b/a Safari Restaurant. Those companies then transferred the funds into an account of Salim Limited LLC at Wells Fargo Bank, from which Salem paid \$952,000 to purchase 5150 Alvarado Lane.

133. Salim Said and Anisa Mohamud Chekchekani (who is believed to be Said's wife) reside at this property.

134. As is set forth above, this property was purchased using fraud proceeds and it was involved in, and is traceable to funds involved in, money laundering transactions.

G. 2529 12th Avenue South, Minneapolis, Minnesota,

135. Abdi Nur Salah and a partner purchased this four-unit residential building on or about October 29, 2021. Upon information and belief, Abdi Nur Salah is a relative of Abdulkadir Nur Salah, who is one of the owners of Safari Restaurant.

136. According to Hennepin County Property records, 2529 12th Avenue South was purchased for \$390,000.

137. Bank records show that, on or about October 29, 2021, Salah and/or his partner obtained a \$386,000 cashier's check payable to GCS Title from the ANS Projects LLC account at TruStone Financial Credit Union. Both Abdi Nur Salah and his partner are signers on the ANS Projects LLC account. This check was used to purchase 2529 12th Avenue South.

138. That check for \$386,000 included \$200,000 that ANS Projects LLC received from Stone Bridge Development LLC on or about October 18, 2021. That \$200,000 was traceable to payments from Feeding Our Future which had been routed through Stigma-Free International LLC, Cosmopolitan Business Solutions LLC, and Tunyar Trading LLC.

139. As a result, this property was purchased with proceeds traceable to the fraud and money laundering scheme described above, and it was involved in money laundering transactions and traceable to property involved in such transactions.

H. The properties located at:

- 1) 301-309 (odd addresses) East Lake Street, Minneapolis, Minnesota;**
- 2) 311-319 (odd addresses) East Lake Street, Minneapolis, Minnesota; and**
- 3) at 3018 3rd Avenue South, Minneapolis, Minnesota.**

140. In or about August 2021, Qamar Ahmed Hassan and Sahra Mohamed Nur used \$2.5 million in Federal Child Nutrition Program funds to purchase three buildings in south Minneapolis through Golis Properties.

141. According to Minnesota Secretary of State records, Sahra Mohamed Nur created Golis Properties LLC in December 2020. Secretary of State records list 309 East Lake Street, Minneapolis, Minnesota as the company's registered address and principal executive office.

142. Golis Properties LLC has an account at Woodlands National Bank. Bank records show that Qamar Ahmed Hassan, Sahra Mohamed Nur, and Abdiwahab A. Mohamud are signatories on the account.

143. Bank records also show that Golis Properties LLC transmitted, through a combination of cashier's checks and a wire transfer, approximately \$2.5 million to Banker's Title between June 25, 2021 and August 26, 2021.

144. Records obtained from Banker's Title show that Golis Properties LLC used this money for the purchase of the following three properties in Minneapolis on or about August 30, 2021:

- a. The real property and commercial building located at 301-309 (odd addresses) East Lake Street;

- b. The real property and commercial building located at 311-319 (odd addresses) East Lake Street; and
- c. The real property located at 3018 3rd Avenue South.

145. The payments to the title company for these property purchases were composed entirely or almost entirely of funds that were traceable to the fraud scheme. These funds were paid by Feeding Our Future to S & S Catering Inc., Academy for Youth Excellence and Youth Higher Educational Achievement, then routed through other accounts before being paid to Golis Properties LLC.

146. As a result, these three properties were purchased using fraud proceeds and were involved in, and are traceable to funds involved in, money laundering transactions.

147. Golis Properties is owned and run by conspirators in the fraud and money laundering scheme described above. The purchase of each of these three properties was made using fraud proceeds, and the properties were involved in, and are traceable to funds involved in, money laundering transactions.

I. 8432 Noble Ave. N., Brooklyn Park, Minnesota

148. This property was purchased for \$1,007,617.50 by Five A's Projects LLC on or about October 22, 2021.

149. Five A's Projects LLC is a limited liability company that was registered with the Minnesota Secretary of State on or about October 7, 2021. This entity is owned by Abdi Salah, Abdikadir Mohamud, Abdihakim Ahmed, Ahmed Hashim, and Ahmed Artan.

150. Most or all of the funds that were used to purchase this real property were proceeds of the fraud and money laundering conspiracy. The funds used to purchase this

property include: \$250,000 from Olive Management LLC; \$324,047 from Tunyar Trading LLC; and \$235,000 from Stone Bridge Development LLC (which was funded with payments from Tunyar Trading LLC). An additional \$150,000 was paid by Abdikhakim Ahmed, the founder of ASA Limited LLC.

151. As a result, this property was purchased using fraud proceeds and it was involved in, and is traceable to funds involved in, money laundering transactions.

J. 13825 Edgewood Avenue South, Savage, Minnesota 55378

152. 13825 Edgewood Avenue South, Savage, Minnesota 55378 is the residence of Mohamed Jama Ismail, one of the owners of Empire Cuisine & Marketing LLC. It is also the registered address of Empire Cuisine & Market LLC, a company that fraudulently obtained and misappropriated Federal Child Nutrition Program funds.

153. On or about May 27, 2021, Mohamed Ismail paid off the note secured by the mortgage lien against this property through a payment in the amount of \$137,270.41 to U.S. Bank.

154. This payment was made from Ismail's personal account, which, in turn, was funded with payments from Empire Cuisine and Market LLC that are the proceeds of the fraud and money laundering scheme.

155. As a result, this property was purchased using fraud proceeds and it was involved in, and is traceable to funds involved in, money laundering transactions.

BASIS FOR FORFEITURE

COUNT 1 -

ALL DEFENDANTS

18 U.S.C. § 981(A)(1)(C) for Violations of 18 U.S.C. §§ 1341, 1343 and 1349

156. The actions described above constitute wire fraud, mail fraud and conspiracy to commit mail and wire fraud in violation of 18 U.S.C. §§ 1341, 1343, and 1349.

157. Civil forfeiture of the proceeds of violations of wire fraud and mail fraud, and conspiracy to commit mail and wire fraud, is authorized by 18 U.S.C. § 981(a)(1)(C). More specifically, § 981(a)(1)(C) authorizes forfeiture of “any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting ‘specified unlawful activity’ (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.” Section 1956(c)(7)(A) defines the term “specified unlawful activity” as including “any act or activity constituting an offense listed in section 1961(1) of this title.” And 18 U.S.C. § 1961(1) includes violations of 18 U.S.C. §§ 1341 and 1343 in its definition of racketeering activity.

158. The Defendant Real Properties constitute, and are derived from, proceeds of wire and mail fraud, and a conspiracy to defraud the United States federally funded child nutrition programs, and are therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

COUNT 2

ALL DEFENDANTS

18 U.S.C. § 981(A)(1)(A) – for Violations Of 18 U.S.C. §§ 1956 And 1957

159. Pursuant to 18 U.S.C. § 981(a)(1)(A), the United States is authorized to forfeit “any property, real or personal, involved in a transaction . . . in violation of section 1956 [or] 1957... of this title, or any property traceable to such property.”

160. A violation of 18 U.S.C. § 1956 occurs when a person conducts or attempts to conduct a financial transaction knowing that it involves the proceeds of a specified unlawful activity when the transaction is designed in whole or part “to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of the specified unlawful activity; or . . . to avoid a transaction reporting requirement under State or Federal law.”

161. 18 U.S.C. § 1957(a) prohibits among other things, knowingly engaging in a monetary transaction in criminally derived property of a value of more than \$10,000, when such property derived from a specified unlawful activity.

162. Wire fraud and mail fraud are specified unlawful activities pursuant to 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1).

163. The Defendant Real Properties are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because they were each involved in, or are traceable to property involved in, money laundering transactions in violation of 18 U.S.C. §§ 1956 and 1957.

CLAIM FOR RELIEF

164. The United States requests that the Court issue a warrant for the arrest and seizure of the Defendant Real Properties, and that after the search and seizure warrants are executed, notice of this action be given to all persons who reasonably appear to be potential claimants of interests in the Defendant Real Properties, that the Defendant Real Properties be forfeited and condemned to the United States of America, that the United States be awarded its costs and disbursements in this action, and for such other and further relief as this Court deems proper and just.

Dated: 1-21-2022

CHARLES J. KOVATS, JR.
Acting United States Attorney

s/Craig Baune
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VERIFICATION

I, Travis Wilmer, verify and declare under penalty of perjury as follows:

I am and have been a Special Agent with the Federal Bureau of Investigation since November 8, 2021. I have read the foregoing Verified Complaint *In Rem* and know the contents thereof, and the matters contained in the Verified Complaint are true to my own knowledge, except that those matters not within my knowledge are alleged on information and belief, and I believe those matters to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information provided to me by other law enforcement agencies and officers, and information I have learned by reviewing reports prepared by other law enforcement agencies and officers, as well as my investigation of this case, as an FBI Special Agent.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Dated: 1-21-2022

s/Travis Wilmer

TRAVIS WILMER, Special Agent
Federal Bureau of Investigation